

# **EXHIBIT 6**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL, )  
Plaintiff, )  
-against- ) 20-cv-7311 (LAK)  
DONALD J. TRUMP, in his )  
personal capacity, )  
Defendant. )  
\_\_\_\_\_ )

\*\*\*CONFIDENTIAL\*\*\*

VIDEOTAPED DEPOSITION OF  
E. JEAN CARROLL  
New York, New York  
Friday, October 14, 2022

Reported By:  
CATHI IRISH, RPR, CRR, CLVS

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2 It was a counter with boxes and a body  
3 suit.

4 BY MS. HABBA:

5 Q. Did the counter display items in  
6 it?

7 A. I don't remember seeing things  
8 displayed but I don't remember.

9 Q. So what happened after he picked  
10 up the lingerie?

11 A. He snatched it up and he said go  
12 put this on.

13 Q. What happened then?

14 A. I said you put it on, it's your  
15 color.

16 Q. What color was it?

17 A. Gray blue.

18 Q. Gray blue. Do you remember the  
19 brand?

20 A. No. It was a very beautiful  
21 piece of lingerie though.

22 Q. What did it look like?

23 A. See-through, lilac grayish-blue  
24 edged with a little bit of lace, very  
25 pretty.

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2 Q. And what type of lingerie was it?

3 A. It was a one-piece body suit.

4 Q. So what happened next?

5 A. He threw it back at me and he  
6 said go put this on.

7 Q. Did he hand it to you?

8 A. No, he threw it at me. So I  
9 tossed it back to him and said it goes  
10 with your eyes.

11 Q. Did he catch it?

12 A. Yeah, he caught it like this  
13 (indicating).

14 Q. She can't, she has to articulate.

15 A. He held it like this  
16 (indicating).

17 MS. KAPLAN: Videographer, are  
18 you getting this all on the video?

19 THE VIDEOGRAPHER: Yes.

20 BY MS. HABBA:

21 Q. He caught it and held it to his  
22 chest, is that what you're doing with your  
23 hands?

24 A. He went like this and then he  
25 held it against my chest and said you're

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2 in good shape, this looks like it might  
3 fit you.

4 Q. Okay. And then what happened?

5 A. And then I said but it's your  
6 size. This was banter. We're going back  
7 and forth. He's saying put this on, I'm  
8 saying you put it on. He's saying -- I  
9 thought it was an enjoyable repartee.

10 Q. And when you say it was his size,  
11 was it a large size piece of lingerie?

12 A. It was a joke to say that.

13 Q. Okay. I just want to clarify for  
14 the record.

15 A. No, it was not a huge piece.

16 Q. What happened next?

17 A. And then I said it's your size  
18 and he took my arm and he said let's go  
19 put this on, and I started laughing  
20 because I'm thinking to myself this is  
21 hilarious, I'm going to make him put it on  
22 over his pants. That's my plan. And then  
23 after I make him put it on over his pants  
24 I'm going to have a story that I can tell  
25 my friends at dinner.

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2 Q. Did you think that Donald Trump  
3 would put the piece of lingerie over his  
4 pants?

5 A. I did.

6 Q. Did he indicate that to you?

7 A. He was very different. He was  
8 not the former president at the time. He  
9 was a man about town with a good sense of  
10 humor, actually asked me a few questions  
11 about myself, was engaged as a human being  
12 and not riddled with the cares of an  
13 office. He was pretty freewheeling.

14 Q. What kinds of questions did he  
15 ask you about yourself?

16 A. How old I was.

17 Q. Anything we haven't discussed  
18 yet?

19 A. I think he said something about  
20 shopping at Bergdorf's, that he was going  
21 to buy Bergdorf's, that he questioned me,  
22 do you like this store, I was thinking of  
23 buying it.

24 Q. What did you say?

25 A. I said I love Bergdorf's.

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2 Q. When was this conversation?

3 A. Down in the handbags.

4 Q. Any other conversations?

5 A. Yes, there were lots of  
6 conversations but I do not recall them. I  
7 didn't report anything I didn't remember.

8 Q. So what happened after you headed  
9 towards the dressing room?

10 A. Amazingly the dressing room door  
11 was open and I am laughing and thinking  
12 this is the greatest thing, that when he  
13 puts these pants on, I'm going to just --  
14 it's going to be great. And he had me --  
15 he went like this (indicating). I went  
16 into the room.

17 Q. He went like what for the record?

18 A. (Indicating).

19 Q. He gestured for you to go into  
20 the dressing room?

21 A. Yes.

22 Q. With his hands?

23 A. Yes.

24 Q. And do you remember what dressing  
25 room that was?

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2 A. The first one.

3 Q. The first one where?

4 A. On the left.

5 Q. It was the first on the left. So  
6 when you walked into the dressing rooms on  
7 this floor with the lingerie, how far were  
8 they from the counter?

9 A. Not far. About -- I can't say  
10 exactly but it didn't seem far.

11 Q. And do you remember approximately  
12 how many rooms were in that dressing area?

13 A. No.

14 Q. You hadn't seen anybody from the  
15 time that you got on that floor to the  
16 time you got in the dressing room?

17 A. No.

18 Q. There was one dressing room open;  
19 is that correct?

20 A. And the body suit was on the  
21 counter.

22 Q. Were there any other dressing  
23 rooms open?

24 A. I didn't see beyond that.

25 Q. How did you know that that



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2 dressing room was open?

3 A. Because the door was open.

4 Q. Were the other doors closed?

5 A. I don't have a vision of it. I  
6 cannot call it up. I can't call it up.

7 Q. How do you know that there wasn't  
8 somebody in the dressing rooms?

9 A. I don't know that.

10 Q. Did you hear anybody?

11 A. No.

12 Q. So what happened after he  
13 gestured with his hand for you to go into  
14 the dressing room?

15 A. It's all one action. I stepped  
16 into the room, the door was banged closed  
17 and he pushed me up against the wall.

18 Q. I'm just going to slow you down,  
19 I apologize, I'm sure this is difficult to  
20 talk about but the door was banged you  
21 said. Did he slam the door?

22 A. He closed it (indicating).

23 Q. With force?

24 A. He closed it.

25 Q. Did it have a lock on it?

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2 A. I have no idea.

3 Q. Do you remember him locking the  
4 door?

5 A. No, I don't believe he locked the  
6 door.

7 Q. Was this a wood door that would  
8 have hidden the entire room?

9 MS. KAPLAN: Again you have to  
10 say.

11 THE WITNESS: I'm just still  
12 thinking about your last question.  
13 I'm sure he didn't lock it because he  
14 immediately pushed me up against the  
15 wall so hard that I banged my head so  
16 I don't think he was locking it.

17 BY MS. HABBA:

18 Q. Was there a mirror in the room?

19 A. Yes.

20 Q. Where was the mirror in relation  
21 to where your head was?

22 A. It was right, there was a chair  
23 on the left and I was pushed up against  
24 the wall (indicating). If the mirror is  
25 here and the chair is here, this wall,

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2 right next to the door.

3 Q. For the court reporter, when you  
4 walked into the room the mirror was on  
5 your right; is that correct?

6 A. Yes.

7 Q. And to your left is a wall where  
8 the chair was; is that correct?

9 A. Yes.

10 Q. And you went straight back  
11 against the far wall?

12 A. No, the wall was right next to  
13 the door.

14 Q. The wall next to the door where  
15 the chair was, is that the wall you're  
16 referring to?

17 A. Being the chair was here, this is  
18 a wall, the door's here. That's the door  
19 to the dressing room.

20 Q. She's pointing to the door.

21 A. Right next to it.

22 Q. So you went to the right of the  
23 door of the dressing room?

24 A. To the left.

25 Q. You went to the left of the door

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2 when you walked in and that's where he  
3 allegedly pushed you against the wall?

4 MS. KAPLAN: Again you have to  
5 say.

6 THE WITNESS: Yes, yes.

7 BY MS. HABBA:

8 Q. Okay.

9 A. There may have been a second  
10 mirror but that also may have been a  
11 window, I can't remember.

12 Q. Do you remember what the  
13 furniture looked like in that room?

14 A. I remember there was a chair and  
15 a table, a little tiny table and that's  
16 all I remember.

17 Q. Do you remember what the carpet  
18 was?

19 A. No.

20 Q. Okay, so after you bumped your  
21 head, did you say anything?

22 A. I was so shocked that I didn't  
23 speak. What I did was I laughed.

24 Q. Where did you bump your head  
25 exactly?

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2 A. Right in the back of it.

3 Q. In the center of it?

4 A. Yes.

5 Q. Did it hurt?

6 A. It hurt. It jolted me and then  
7 he pushed me back again and I hit it again  
8 for a second time.

9 Q. Was it loud?

10 A. Inside my head, I remember  
11 hearing a bang but...

12 Q. Would somebody have heard it if  
13 they were in the dressing room next door?

14 A. Yes.

15 Q. Would an attendant have heard it  
16 if they were outside the dressing room?

17 A. An attendant would have heard, I  
18 believe so.

19 Q. What happened next?

20 A. An attendant would have heard me  
21 laughing loudly.

22 Q. I know you've addressed this  
23 numerous times publicly but why were you  
24 laughing?

25 A. Shock. Trying to recapture the

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2 camaraderie we had and sort of a feeling  
3 of a lark, we're on a lark, we're having  
4 an adventure, it's a lark, trying to  
5 recapture that and take it out of the  
6 realm where he had entered, trying to  
7 reduce any eroticism about it.

8 Q. Was it erotic?

9 A. Not to me.

10 Q. Was he angry?

11 A. No.

12 Q. What was his demeanor?

13 A. Intent.

14 Q. In any manner did the defendant  
15 lunge at you?

16 A. When he pushed me up against the  
17 wall, he lunged at me and pushed me up  
18 against the wall.

19 Q. What happened next?

20 A. I hit my head twice and then he  
21 had his hands on my arms, pushed me back a  
22 second time, hit my head and then he put  
23 his shoulder into me, and he's a big man.  
24 He's -- and he -- guessing 220, maybe 225  
25 at the time. I weighed 120. He was 100

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2 more pounds. And that was one of the  
3 things that went through my mind was how  
4 big and heavy he was because his whole  
5 weight came, his shoulder came into me and  
6 so at this point I realized it was  
7 serious. I was shocked before because he  
8 put me against the wall but now I  
9 understood that this is -- this is a  
10 battle, and he pulled down my tights.

11 Q. Did you feel like he was trying  
12 to hurt your head when he --

13 A. No, no. No. He was not trying  
14 to hurt me. He was trying to rape me and  
15 it was -- it was a situation which I never  
16 would have -- when it went from good humor  
17 joshing into being up against the wall and  
18 then having that heavy weight against me.

19 Q. What did he do after that?

20 A. He pulled down my tights.

21 Q. Had you said anything at this  
22 point?

23 A. I cannot believe that I didn't  
24 say anything but I don't remember that I  
25 said anything. That doesn't mean I didn't

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2 say anything but I -- I can't imagine  
3 being quiet. I can't imagine not saying  
4 anything but I can't remember saying  
5 anything.

6 Q. Did you scream?

7 A. No.

8 Q. Did you push him?

9 A. Yes.

10 Q. Where?

11 A. I had my purse in this hand.

12 Q. In your right hand?

13 A. Right hand. And I tried to get  
14 my arms up to push him back, to push him  
15 back. The problem was I couldn't get my  
16 knee up because the pantyhose had been  
17 taken down.

18 Q. So he had hit your head twice  
19 prior to taking your pantyhose off  
20 according to you; right?

21 A. He didn't take the pantyhose off.

22 Q. He did not?

23 MS. KAPLAN: Again --

24 THE WITNESS: No, he did not take  
25 the pantyhose off.



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2 BY MS. HABBA:

3 Q. Okay. So what happened?

4 A. Pulled them down.

5 Q. And then what happened?

6 A. And then I felt his fingers  
7 rummaging around my vagina and this huge  
8 weight against me. My head hurt, this  
9 huge weight, I'm in a situation where I  
10 can't -- I can't -- at one point I  
11 remember saying this is Donald Trump, what  
12 the heck is going on? And then I felt his  
13 penis inside of me.

14 Q. So sorry to get into details  
15 but --

16 A. No, I understand.

17 Q. If you're against the wall, it  
18 was his right shoulder that you are  
19 describing was pushing into you?

20 A. Left, I think.

21 Q. His left shoulder, sorry, because  
22 you did touch your left side so I assumed  
23 it was the right. So it was his left  
24 shoulder and he used his right hand?

25 A. I don't know. I couldn't see his

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2 hand.

3 Q. And did you recall at any point  
4 him taking his pants off?

5 A. No, no, he didn't take his pants  
6 off.

7 Q. He did not take his pants off?

8 MS. KAPLAN: Again --

9 THE WITNESS: No.

10 BY MS. HABBA:

11 Q. So how did you have sex if he  
12 didn't take his pants off?

13 A. He took his penis out of his  
14 pants.

15 Q. So he only unzipped his pants?

16 A. I don't know. I didn't see the  
17 pants. He's leaning, I can't see  
18 anything, I've got -- I'm pinned, I can't  
19 see down. I don't know if he unzipped  
20 them. Obviously he unzipped them because  
21 then I felt the penis.

22 Q. Did you feel a belt?

23 A. I -- no, I did not feel a belt.  
24 I felt the penis, I felt the fingers  
25 first, then the penis.